

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

1 APPEARANCES:

2 On behalf of the Plaintiff:

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11 On behalf of the Defendant Det. Alfred Johnson:

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22 On behalf of the Defendants Officers Steven Davis
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1 APPEARANCES:

2 On behalf of the Defendant Patrolman Ron Dodge:

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10 On behalf of the Defendant Southeast Area Law
11 Enforcement Network:

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1 INDEX

2 WITNESS: CROSS REDIRECT

3 Andrew Carr

4 By Mr. Bacevice 5/86

5 By Mr. Lobe 52

6 By Ms. Citraro 82

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8
9 (No exhibits marked.)

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1 ANDREW CARR

2 of lawful age, being first duly sworn, as
3 hereinafter certified, was examined and testified
4 as follows:

5 CROSS-EXAMINATION

6 By Mr. Bacevice:

7 Q Good morning. Can you please state and spell
8 your name for the record?

9 A Andrew Carr, A N D R E W, C A R R.

10 Q Good morning, Mr. Carr. My name is Jack
11 Bacevice. I'm an attorney with the City of
12 Cleveland. I represent Detective, now
13 Sergeant Alfred Johnson in this matter.

14 A Good morning.

15 Q I'm going to be taking your deposition this
16 morning. Have you ever had your deposition
17 taken before?

18 A No.

19 Q Let's go over some ground rules. It's pretty
20 simple. I'm going to ask you straightforward
21 questions to the best of my ability. You are
22 going to have to give me straightforward
23 answers, okay?

24 A Okay.

25 Q One of the first things, you have to answer

1 A Know what?

2 Q You don't know for certain that she had it in
3 Bedford. You just know it wasn't in the house
4 that day?

5 A I don't think it was in house that day.

6 Q At some point he got it back from your mom, or
7 it's your stepmom right?

8 A Yes, my stepmom.

9 Q He got it back from her at some point because
10 he has it now, right?

11 A Yes.

12 Q You just don't know when?

13 A No, I don't.

14 Q So, you were arrested, right?

15 A Yes.

16 Q Do you know who put you under arrest?

17 A When I was in -- actually in the jail, or
18 like --

19 Q On the scene, do you know who put handcuffs on
20 you?

21 A No.

22 Q Do you know what department? Do you know
23 anything about the person who put handcuffs on
24 you?

25 A No, I don't.

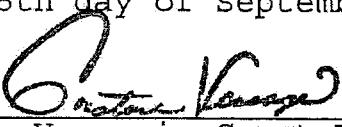
1 State of Ohio,)
2) SS: CERTIFICATE
2 County of Cuyahoga.)

3 I, Constance Versagi, Court Reporter and
4 Notary Public in and for the State of Ohio, duly
5 commissioned and qualified, do hereby certify that
6 the within named witness, Andrew Carr,
7 was by me first duly sworn to testify the truth, the
8 whole truth, and nothing but the truth in the cause
9 aforesaid; that the testimony then given by him was
10 by me reduced to stenotypy/computer in the presence
11 of said witness, afterward transcribed, and that the
12 foregoing is a true and correct transcript of the
13 testimony so given by him as aforesaid.

14 I do further certify that this deposition was
15 taken at the time and place in the foregoing caption
16 specified, and was completed without adjournment.

17 I do further certify that I am not a relative,
18 counsel, or attorney of either party, or otherwise
19 Interested in the event of this action.

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand and affixed my seal of office at Cleveland,
22 Ohio, on this 5th day of September, 2018.

23 
24 Constance Versagi, Court Reporter and
25 Notary Public in and for the State of Ohio.
My Commission expires January 14, 2023.

